

EXHIBIT 1

Law Offices of John E. Clarke, LLC Attorney ID #014231992
16 Furler Street
Totowa, New Jersey 07512
(973) 812-8840
ATTORNEY FOR PLAINTIFF – Lisandro R. Tupete

RECEIVED
Superior Court of New Jersey
JUL 24 2017
Passaic County

Lisandro R. Tupete

Plaintiff(s),

vs.

John P. Boozell, Estes Express Lines, Ace
Property & Casualty Insurance Company, John
Doe 1-10 (fictitious) and ABC Corp. 11-20
(fictitious)

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION PASSAIC COUNTY
DOCKET NO.

L-2428-17
Civil Action

COMPLAINT and JURY DEMAND

The Plaintiff, Lisandro R. Tupete, residing in the City of Paterson, County of Passaic, and
State of New Jersey complains of the Defendants and says:

FIRST COUNT

1. On or about July 28, 2015, the Plaintiff, Lisandro R. Tupete was the operator of a motor vehicle that was proceeding on New Maple Avenue in Montville Township, NJ.
2. At the same time and place, a vehicle owned by Defendant, Estes Express Lines and operated by Defendant, John P. Boozell, was also proceeding on New Maple Avenue in Montville Township, NJ.
3. The vehicle of the Defendant(s) was operated, maintained and/or controlled in a careless, reckless and negligent manner resulting in a collision with the vehicle of the Plaintiff, Lisandro R. Tupete.

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4. John Doe 1-10 and ABC Corp. 11-20, said names being fictitious, are named as Defendants herein and intended to represent any person(s), company(ies), or corporation(s), whose identity is presently unknown who may have contributed to the negligence causing this accident, or may be otherwise liable for payment of damages for the negligence of others.

5. As a result of the Defendants conduct and negligence, the Plaintiff, Lisandro R. Tupete, was caused to suffer serious and permanent injuries, suffered and will in the future suffer great pain and mental anguish, was and will in the future be prevented from engaging in his usual pursuits and occupations, and was and will in the future be required to expend substantial sums of money for medical treatment in an effort to effect a cure for his said injuries.

WHEREFORE, the Plaintiff, Lisandro R. Tupete, demands judgment against the Defendants, jointly and severally, together with interest and costs of suit.

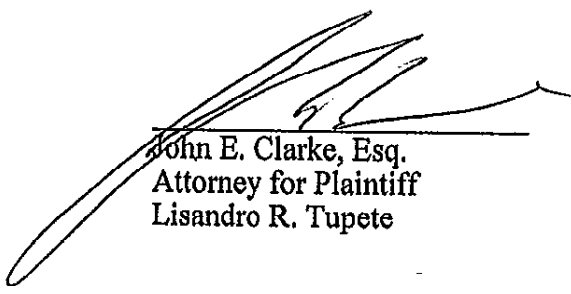
SECOND COUNT

1. Plaintiff(s) repeats the allegations of the First Count as though set forth at length herein.

2. As result of the negligence of the Defendants aforesaid, the Plaintiff, Lisandro R. Tupete was seriously and permanently injured, suffered and will in the future be prevented from engaging in his usual pursuits and occupations, and was and will in the future be required to expend substantial sums of money for medical treatment in an effort to effect a cure for his said injuries.

DEMAND FOR INTERROGATORY ANSWERS

Pursuant to R. 4:17-1(b)(ii), the Plaintiff hereby demands that all Defendants individually answer Form C and Form C1 Interrogatories listed in Appendix II of the Rules of Court



John E. Clarke, Esq.
Attorney for Plaintiff
Lisandro R. Tupete

Dated: July 24, 2017

U.S. District Court
District of Columbia
July 24, 2017